

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X		:
MICHAEL KANE, et al.,		:
	Plaintiffs,	:
- against -		:
DE BLASIO et al.,		:
	Defendants.	:
-----X		:
MATTHEW KEIL, et al.		:
	Plaintiffs,	:
- against -		:
THE CITY OF NEW YORK et al.,		:
	Defendants.	:
-----X		:

Case No. 21-cv-7863 (VEC) (Lead)

Case No. 21-cv-8773 (VEC)

DECLARATION OF BETSY COMBIER

Betsy Combiere declares as follows, pursuant to 28 U.S.C. § 1746:

1. My name is Betsy Combiere and I am the President and lead paralegal of Advocatz, a paralegal consulting business for people who need a partner as they go through the Courts, grievances, or life problems.
2. I respectfully submit this Declaration in support of Plaintiffs' Motion for a Preliminary Injunction.
3. I know the facts stated herein to be true based upon my personal knowledge, except for statements which are made on information and belief and, as to those, I verily believe them.

4. I am the Editor of the website Parentadvocates.org, and several blogs including NYC Rubber Room Reporter, National Public Voice, and NY Courts – New York Court Corruption. I am also the President/Director of Theater Kids, Inc. and President of The E-Accountability Foundation, a 501(c)(3) not-for-profit company which funds exposure of public corruption, fraud and misconduct by public servants and judges.
5. I am an advocate who has successfully assisted parents, children, and caregivers with the educational needs of their children, and I have been advocating for the due process rights of Union members—in particular, members of the AFL-CIO, United Federation of Teachers and Local 32 B&J—for 17 years.
6. I have a degree in Child Psychology from Northwestern University, an MA Certificate from the Johns Hopkins' School for Advanced International Studies where my specialization was the Soviet Military Industrial Complex, an MPS in Interactive Telecommunications from New York University, and a Certificate in Art and Drama Therapy from The New School.
7. I visited the New York City Department of Education's ("DOE") teacher re-assignment centers ("TRCs" or "rubber rooms") every week from 2004-2007 as an interested member of the public. From 2007-2010, I worked as Special Representative to the United Federation of Teachers ("UFT") where my job was to oversee the 8 re-assignment centers in the NYC DOE, first in all boroughs, and then at the Manhattan, Brooklyn, and Bronx locations.
8. I am very familiar with the 3020-a arbitration hearing process, set forth in New York Education Law § 3020-a, having assisted teachers in approximately 300 3020-a

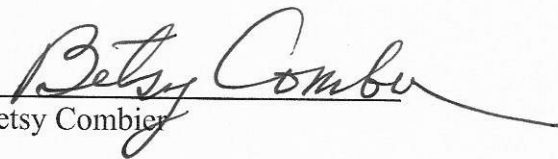
arbitration hearings (including research, writing closing arguments, and developing questions for testimony) since 2003.

9. I am currently providing support to many DOE employees whose religious exemption requests from the DOE's vaccination mandate were both denied and granted.
10. I know of one DOE employee whose religious exemption request was denied by a Scheinman Arbitration and Mediation Services ("SAMs") arbitrator, when her daughter's substantially similar religious exemption request was granted by a SAMs arbitrator.
11. Upon information and belief, DOE substitute teachers, or teachers who worked less than 20 hours per week were not given the opportunity to obtain a religious exemption from the vaccine mandate.
12. One of my other clients is a DOE employee who was told by her arbitrator in her SAMs arbitration that if she did not hear from him, that her religious exemption request was granted. She never received an official document granting her exemption from that arbitrator, but was subsequently assigned to a DOE resource room where she now provides in-person support services for children. In that role, she is not required to be vaccinated or engage in periodic testing, but she comes into contact with other teachers and children on a daily basis.
13. Upon information and belief, any DOE teacher who does not get vaccinated has their fingerprints placed onto the "no hire/inquiry list" or "Problem Code" by the NYC DOE Office of Personnel Investigations. The flag on the fingerprints and the employee social security number are sent to the FBI and State Division of Criminal Justice Services.

14. I am aware of individuals who were granted religious exemptions and who now report daily to TRCs or rubber rooms in the City. Most of these individuals' religious exemptions expire in either March or June 2022, and they have not heard from the DOE regarding what happens after their exemption expires.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
April 7, 2022


By: Betsy Combier